

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
DOCKET NO. CRIMINAL 24-72

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	DEFENDANT JERRY HAL SALITERMAN
)	STATEMENT OF FACTS IN SUPPORT OF
vs.)	EXCLUSION OF SPEEDY TRIAL TIME
)	
JERRY HAL SALITERMAN,)	
)	
DEFENDANT.)	
*	*	*

This matter is before the Court on Defendant's Motion for continuance of arraignment and related dates in Dockets 15 and 17.

I, Jerry Hal Saliterman, now personally makes this Statement of Facts in Support of Exclusion of Speedy Trial time resulting from this request. I respectfully request that the Court continue dates set in the Arraignment Notice and Scheduling Order (Docket 15) and Trial Notice (Docket 17) to permit my counsel adequate time to prepare for trial. I realize this request will delay my trial many months, likely well into 2025.

The Court should find that this case is complex within the meaning of 18 U.S.C. § 3161(h)(7)(B)(ii), grant this motion for extension of the deadlines in Docket 15 and trial date (May 20, 2024), as set in the Trial Notice Order (Docket 17)), and exclude any consequent delay resulting from the granting of this motion from the computation of the speedy trial time because “the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial” pursuant to 18 U.S.C. § 3161(h)(7)(A), for the following reasons. that my counsel has discussed with met and with which I agree.

The Grand Jury charged me on 13 March 2024 with Count One, Theft of Major Art Work, Title 18, United States Code, Section 668 and Count Two, Witness Tampering, Title 18, United States Code, Section 1512(b)(3), committed over a thirteen-year period from 2005 to 2018 (Count 1) and 2023 to 2024 (Count 2). Indictment at 1-2 (Docket 1).

The Government's investigation over this fourteen-year period consists of 35,000 pages of material. I specifically request that the Court grant my request for these continuances because there is no possibility that my counsel can digest and analyze this voluminous discovery without these continuances. In addition, review of this material will undoubtedly generate investigative measures that must be taken to prepare for trial. I understand that this request by me will delay my trial by many months and specifically waive my constitutional and statutory speedy trial rights so that these continuances may be granted. I make these waivers after full consultation with my counsel and on his advice to do so. I have not been coerced by anyone to waive these rights and do so of my own free will with full understanding of my rights.

Dated: 9 April 2024

s/Jerry Hal Saliterman

Jerry Hal Saliterman

s/John C. Brink
Counsel for Jerry Hal Saliterman

Signed original of this document available from counsel on request,